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*In Propria Persona*

**UNITED STATES DISTRICT COURT FOR  
THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

**TODD R. G. HILL, et al,**

**Plaintiffs**

**vs.**

**THE BOARD OF DIRECTORS,  
OFFICERS AND AGENTS AND  
INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW, et al.,**

**Defendants.**

**CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM**

**The Hon. Josephine L. Staton**  
Courtroom 8A, 8th Floor

**Magistrate Judge Brianna Fuller Mircheff**  
Courtroom 780, 7th Floor

**PLAINTIFF'S NOTICE OF PENDING  
COURT-AUTHORIZED FILING  
(SURREPLY UNDER DOCKET 289)**

**NO ORAL ARGUMENT REQUESTED**

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**PLAINTIFF'S NOTICE OF PENDING COURT-AUTHORIZED FILING (SURREPLY UNDER DOCKET  
289)**

CASE 2:23-CV-01298-JLS-BFM

**PLAINTIFF’S NOTICE OF PENDING COURT-AUTHORIZED FILING  
(SURREPLY UNDER DOCKET 289)**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff respectfully submits this notice to inform the Court that the Court-authorized surreply, submitted pursuant to Docket 289, remains pending administrative docketing as of the date of this filing.

Pursuant to the Court’s in-chambers order (ECF No. 289), Plaintiff was granted leave to file a surreply in opposition to Defendant Spiro’s Request for Judicial Notice (Docket 278). In compliance with that order, Plaintiff timely submitted the surreply and supporting exhibits on May 7, 2025, under EDSS Tracking Number EDS-250507-001-9955, well in advance of the Court’s May 20 deadline.

As of May 12, 2025 at 10:45 AM PDT, the surreply has not yet been reflected on the public docket. The filing includes factual and evidentiary material directly responsive to the assertions in Defendant Spiro’s reply (Docket 283), evidentiary supplement (Docket 282), and request for judicial notice (Docket 296). Plaintiff respectfully submits that docketing and consideration of the surreply are necessary to ensure a procedurally complete record prior to any ruling on the associated matters.

Plaintiff further notes that the surreply includes five attached exhibits (A through E) containing contemporaneous records and internal communications that materially impact the factual and procedural context of the pending matters. These exhibits directly rebut narrative assumptions presented by Defendant Spiro and reinforce the presence of factual disputes that cannot be resolved at the pleading stage. Plaintiff respectfully requests that no ruling be issued on Dockets 283 or 296 until the Court has reviewed and docketed the surreply and its supporting materials.

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289)**

CASE 2:23-CV-01298-JLS-BFM

1 This notice is submitted to preserve the integrity of the record, avoid any inference of waiver or  
2 procedural default, and respectfully request that the surreply be docketed and reviewed consistent  
3 with the Court's prior order.  
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5 Respectfully submitted,  
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7 Dated: May 12, 2025  
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12 Todd R. G. Hill  
13 Plaintiff, Pro Se  
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15 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**  
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17 The undersigned party certifies that this brief contains 301 words, which complies with the 7,000-  
18 word limit of L.R. 11-6.1.

19 Respectfully submitted,  
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23 May 12, 2025  
24 Todd R.G. Hill  
25 Plaintiff, in Propria Persona  
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289)**

**Plaintiff's Proof of Service**

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,



May 12, 2025  
Todd R.G. Hill  
Plaintiff, in Propria Persona

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